



UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY REGION IX
75 Hawthorne
Street San
Francisco, CA

March 30, 2018

George ("Pat") Brooks
US Department of the Navy
33000 Nixie Way, Bldg 50
San Diego, CA 92147

Dear Mr. Brooks:

Thank you for providing for review the *Draft Radiological Data Evaluation Findings Report for Parcels D-2, UC-1, UC-2, UC-2, and UC-3 Soil* ("Report"), Former Hunter's Point Naval Shipyard, October 2017. The U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control (DTSC), and the California Department of Public Health (CDPH) have independently reviewed this report in detail with a technical team including national experts in health physics, geology, and statistics, and EPA's comments are attached.

In these parcels, the Navy recommended resampling in 61% of soil survey units in trenches and fill. EPA, DTSC, and CDPH found signs of potential falsification, data manipulation, and/or data quality concerns that call into question the reliability of soil data in an additional 32% of survey units, bringing to 93% the total suspect soil survey units. In summary, the data analyzed demonstrate a widespread pattern of practices that appear to show deliberate falsification, failure to perform the work in a manner required to ensure ROD requirements were met, or both.

Attached are 1) narrative comments, 2) an Excel workbook with several spreadsheets that give the detailed reviews of individual trench survey units, and a 3) workbook with spreadsheets for the fill units. EPA previously submitted comments December 29, 2018, on the Navy's similar report for Parcels B and G. Most of these previous comments that address the overall approach also apply to this report, so they are not repeated in the attached narrative comments.

We look forward to working with the Navy to scope out and begin the sampling component of the radiological assessment effort as soon as possible. If you would like to discuss any of these comments, please contact me at 415-947-4187 or [[HYPERLINK "mailto:lee.lily@epa.gov" \h](mailto:lee.lily@epa.gov)] You may also contact my manager John Chesnutt at 415-972-3005 or [[HYPERLINK "mailto:chesnutt.john@epa.gov" \h](mailto:chesnutt.john@epa.gov)]

Sincerely,

A handwritten signature in black ink, appearing to read "Lily Lee", is positioned above the printed name.

Lily Lee
Remedial Project Manager

Attachments

cc: Nina Bacey, DTSC
Tracy Jue, CDPH
Jeff White, California Regional Water Quality Control Board

Amy Brownell, San Francisco Department of Public Health